- 1		
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2	Orlando De Castroverde, Esq.	
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4	1149 S. Maryland Parkway	
5	Las Vegas, Nevada 89104 Phone: (702) 241-5768	
6	Facsimile: (702) 383-8741	
7	Email: brandonn@dlgteam.com Attorney for Plaintiff	
8		
9	Darrell D. Dennis, Esq.	
10	Nevada Bar No. 6618 Michael R. Smith, Esq.	
11	Nevada Bar No. 12641 LEWIS BRISBOIS BISGAARD &	
'	SMITH, LLP	
13	6385 S. Rainbow Blvd. Ste. 600 Las Vegas, NV 89118	
14	Telephone: (702) 893-3383	
	Facsimile: (702) 893-3789 Email: Darrell.Dennis@LewisBrisbois.com	
15 16	Email: Michael.R.Smith@LewisBrisbois.com Attorneys for Defendant	
17	UNITED STATES DIS	TRICT COURT
' <i>'</i> 18	DISTRICT OF N	
		CASE NO.: 2:23-cv-00137-APG-BNV
19	JOYCE VICKERY, an individual,	CASE NO.: 2.23-CV-00137-APG-DNV
20	Plaintiff,	JOINT PRETRIAL ORDER
21	V.	
22	DEMETRIC DANARD SOLMON, an	
23	individual; DOES 1-20 and ROE BUSINESS ENTITIES 1-20, inclusive,	
24	, ,	
25	Defendant.	
26	After pretrial proceedings in this case,	
27	IT IS ORDERED:	
28		
	148124002.1 Page 1 of 13	

I.

This is an action for negligence.

Plaintiff seeks relief including general damages, special damages, attorney's fees and costs, interest at the statutory rate, and for any such other and further relief the Court deems just and proper.

Plaintiff is Joyce Vickery.

Defendant is Demetric Danard Solomon.

The event which gives rise to this action is an automobile/pedestrian collision which occurred in Clark County, Nevada on October 21, 2021. Plaintiff alleges that as she was lawfully crossing Valley View Boulevard at a mib-block crosswalk north of the intersection of Valley View Boulevard and Flamingo Road, that she was struck by a motor vehicle operated by Defendant. Plaintiff alleges that as a result of Defendant's negligence, that she sustained significant personal injuries including, but not limited to, broken right arm/elbow, broken leg, and broken pelvis. Plaintiff alleges that she was required to undergo surgeries to repair the broken bones and hospital treatment as part of her recovery/rehabilitation.

Defendant denies he was negligent and liable for Plaintiff's injuries. Defendant further denies that Plaintiff is entitled to damages or any other relief.

II.

Statement of Jurisdiction:

Because this case is based upon diversity of citizenship jurisdiction under 28 U.S.C. §1332 and was therefore removed from state court through 28 U.S.C. §1441(b), jurisdiction is conferred upon this Court.

Specifically, Plaintiff was, at the time of the subject incident and at the time of filing of the State Court civil action, a resident of the Maricopa County, Arizona. Defendant was, at the time of the subject incident and at the time of filing of the State Court civil action, a resident of Hillsborough County, Florida.

III.

The following facts are admitted by the parties and require no proof:

IV.

The following facts, though not admitted, will not be contested at trial by evidence to the contrary:

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The following are the issues of fact to be tried and determined at trial:

Plaintiff's Proposed Issues of Fact:

- 1. Whether Plaintiff had the right-of-way when crossing Valley View Boulevard.
- 2. Whether Defendant failed to yield the right-of-way to Plaintiff.
- 3. Whether Defendant ran a red light.
- 4. Whether Plaintiff's injuries are proximately and directly related to Defendant's actions.
- 5. The value of Plaintiff's economic and non-economic damages.

Defendant's Proposed Issues of Fact:

- 1. Whether Plaintiff had the right-of-way when crossing Valley View Boulevard.
- 2. Whether Plaintiff acted legally in her crossing of Valley View Boulevard.

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- 3. Whether Defendant had the ability to stop his vehicle when Plaintiff initiated her crossing of Valley View Boulevard.
- 4. Whether Defendant could have acted to avoid the subject event.
- Whether Plaintiff's injuries are proximately and directly related to/caused by the subject event.
- 6. Whether Plaintiff's claimed damages are proximately and directly related to/caused by the subject event.
- 7. The value, if any, of Plaintiff's claimed economic and non-economic damages.

VI.

The following are the issues of law to be tried and determined at trial:

Plaintiff's Proposed Issues of Law:

- Whether Defendant was negligent when approaching Plaintiff in the marked crosswalk on Valley View Boulevard.
- 2. Whether Defendant's negligence was the cause of Plaintiff damages.
- 3. Whether Defendant is liable for Plaintiff's damages.
- The Jury is to decide the value of Plaintiff's economic and non-economic damages.

Defendant's Proposed Issues of Law:

- Whether Defendant was negligent in causing/contributing to the cause of the subject event.
- 2. Whether Plaintiff was negligent in causing/contributing to the cause of the subject event.

- 3. Whether Plaintiff's actions in commencing the crossing of Valley View Boulevard was lawful.
- 4. Whether Defendant is liable for Plaintiff's claimed damages.
- 5. Whether Plaintiff's claimed damages are reasonable, necessary, and the result of the subject event.
- 6. The Jury is to decide the value of Plaintiff's economic and no-economic damages, is any.

VII.

(a) The following exhibits are stipulated into evidence in this case and may be so marked by the clerk: See attached spreadsheets.

Attachment A, containing Plaintiff's exhibits and Defendants' objections thereto. "No Objection" indicates that admissibility of the exhibit is stipulated. "Objection but Stip to Authenticity" indicates that there is no stipulation as to admissibility, but there is stipulation as to authenticity.

Attachment B, containing Defendant's exhibits and Plaintiff's objections thereto. "No Objection" indicates that admissibility of the exhibit is stipulated. "Objection but Stip to Authenticity" indicates that there is no stipulation as to admissibility, but there is stipulation as to authenticity.

- (b) As to the following exhibits, the party against whom the same will be offered objects to their admission on the grounds stated:
 - Defendants' objections to Plaintiff's exhibits, subject to further meet and confer efforts can be found on Attachment A, Plaintiff's List of Exhibits for Joint Pretrial Order.

- Defendants wish to admit all remaining documents that are not listed on Attachment A, Plaintiff's List of Exhibits for Joint Pretrial Order. Plaintiff objects to their admission under Federal Rules of Evidence 401, 403, 602, 801, 802, 805, 901.
- Plaintiff's objections to Defendant's exhibits, subject to further meet and confer efforts can be found on Attachment B, Defendant's List of Exhibits for Joint Pretrial Order.
- 4. Plaintiff wishes to admit all remaining documents that are not listed on Attachment B, Defendant's List of Exhibits for Joint Pretrial Order. Defendant objects to their admission under Federal Rules of Evidence 401, 403, 602, 801, 802, 805, 901.

(c) Electronic evidence:

Plaintiff's Statement: Plaintiff intends to introduce evidence in electronic format to jurors for purposes of jury deliberations.

Defendants' Statement: Defendant intends to introduce evidence in electronic format to jurors for purposes of jury deliberations.

(d) Depositions:

1. Plaintiff will offer the following depositions: Plaintiff reserves the rights under Rule 32 to use admissible testimony of the opposing parties for any purpose. Plaintiff also reserves the right to use admissible testimony provided in Plaintiff Joyce Vickery's deposition if needed. With respect to non-party depositions, the parties anticipate utilizing depositions as permitted under the Federal Rules of Evidence.

2. Defendant will offer the following depositions: Defendant reserves the rights under Rule 32 to use admissible testimony of the opposing parties for any purpose. Defendant also reserves the right to use admissible testimony provided in Plaintiff Joyce Vickery's deposition, Defendant Demetric Solomon's Deposition, and Las Vegas Metropolitan Police Department Officer Kircher's Deposition if needed. With respect to non-party depositions, the parties anticipate utilizing depositions as permitted under the Federal Rules of Evidence.

(e) Objections to depositions:

- Defendant objects to Plaintiff's depositions as follows: Defendant objects to Plaintiff's designated depositions to the extent they are inadmissible in accordance with the Federal Rules of Evidence. Specific objections include FRE 401, 403, 602, 613, 701, 801, 802, 805, 901.
- Plaintiff objects to Defendant's depositions as follows: Plaintiff objects
 to Defendant's designated depositions to the extent they are inadmissible
 in accordance with the Federal Rules of Evidence. Specific objections
 include FRE 401, 403, 602, 613, 701, 801, 802, 805, 901.

VIII.

The following witnesses may be called by the parties at trial:

(a) Plaintiff's witnesses:

1.	Joyce Vickery	c/o DE CASTROVERDE LAW GROUP	
		1149 South Maryland Pkwy	
		Las Vegas, NV 89104	
		T: 702-241-5730	
2.	Demetric Danard Solomon	c/o Michael Shirts	

1			Lewis Brisbois Bisgaard & Smith, LLP
			6385 S. Rainbow Boulevard, Suite 600
2			Las Vegas, NV 89118
3			T: 702-893-3383
4	3.	Officer Stephen Kircher, Badge No.	c/o Las Vegas Metropolitan Police
4		3390	Department
5	5 400 S. M		400 S. Martin Luther King Blvd.
6			Las Vegas, NV 89101
			T: 702-828-3111
7	4.	Rodney K. Vickery	12799 S. 17th St.
8			Goodyear, AZ 85338
9	<u> </u>		T: 623-231-8392
	5.	Randa Bascharon, D.O., CIME	Orthopedic & Sports Medicine Institute
10			of Las Vegas
11			7281 West Sahara Avenue, Suite 110
			Las Vegas, NV 89117 T: 702-947-7790
12	6.	Kovin Kumudla MD	
13	o.	Kevin, Kuruvilla, M.D.	c/o University Medical Center 1800 W. Charleston Blvd.
14			Las Vegas, NV 89102
			T: 702-383-2000
15	7.	lan Joseph Isby, M.D.	c/o University Medical Center
16	′ ·	lan dedeph loby, W.D.	1800 W. Charleston Blvd.
17			Las Vegas, NV 89102
			T: 702-383-2000
18	8.	Arthur J Lyon, M.D.	c/o University Medical Center
19			1800 W. Charleston Blvd.
20			Las Vegas, NV 89102
20			T: 702-383-2000
21	9.	Disha B. Mehta, M.D.	c/o University Medical Center
22			1800 W. Charleston Blvd.
			Las Vegas, NV 89102
23			T: 702-383-2000
24	10.	Robert Mercer, M.D.	c/o University Medical Center
25			1800 W. Charleston Blvd.
			Las Vegas, NV 89102
26			T: 702-383-2000
27	11.	Gerald M. Sylvian, M.D.	c/o University Medical Center
28			1800 W. Charleston Blvd.
20			Las Vegas, NV 89102

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1			T: 702-383-2000	
	12.	Taylor Schanda, M.D.	c/o University Medical Center	
2			1800 W. Charleston Blvd.	
3			Las Vegas, NV 89102	
4			T: 702-383-2000	
	13.	Eric Robert McClintock, M.D.	c/o University Medical Center	
5			1800 W. Charleston Blvd.	
6			Las Vegas, NV 89102	
7	44	Carab I. Via a M.D.	T: 702-383-2000	
′	14.	Sarah L. Xiao, M.D.	c/o University Medical Center	
8			1800 W. Charleston Blvd.	
9			Las Vegas, NV 89102 T: 702-383-2000	
40	15.	Robert B. Birch, M.D.	c/o University Medical Center	
10	10.	Robert B. Bireri, W.B.	1800 W. Charleston Blvd.	
11			Las Vegas, NV 89102	
12			T: 702-383-2000	
	16.	Ronald J. Knoblock, M.D.	c/o University Medical Center	
13			1800 W. Charleston Blvd.	
14			Las Vegas, NV 89102	
15			T: 702-383-2000	
	17.	Fu Wang, M.D.	c/o University Medical Center	
16			1800 W. Charleston Blvd.	
17			Las Vegas, NV 89102	
18			T: 702-383-2000	
	18.	Briann M. Parker, M.D.	c/o University Medical Center	
19			1800 W. Charleston Blvd.	
20			Las Vegas, NV 89102 T: 702-383-2000	
21	19.	Nikhil Karanth, M.D.	c/o University Medical Center	
	19.	Nikilli Karantii, W.D.	1800 W. Charleston Blvd.	
22			Las Vegas, NV 89102	
23			T: 702-383-2000	
24	20.	Elif Nahas, M.D.	St. Rose Dominican Hospital – Siena	
			Campus	
25			3001 St. Rose Parkway	
26			Henderson, NV 89052	
27			T: 702-616-5000	
	21.	Matthew Ripplinger, M.D.	St. Rose Dominican Hospital – Siena	
28			Campus	

148124002.1 Page **9** of **13**

1			3001 St. Rose Parkway	
	Henderson, NV 89052		Henderson, NV 89052	
2			T: 702-616-5000	
3	3 22. Katherine McClanahan, M.D. St. Rose Dominican Hos		St. Rose Dominican Hospital – Siena	
4			Campus	
4			3001 St. Rose Parkway	
5			Henderson, NV 89052	
6			T: 702-616-5000	
7	23.	Daphne Wong, M.D.	St. Rose Dominican Hospital – Siena	
′			Campus	
8			3001 St. Rose Parkway Henderson, NV 89052	
9			T: 702-616-5000	
	24.	Kevin Slaughter, M.D.	St. Rose Dominican Hospital – Siena	
10	24.	Reviir Gladgitter, W.D.	Campus	
11			3001 St. Rose Parkway	
12			Henderson, NV 89052	
			T: 702-616-5000	
13	25.	Tiffany Wright, APRN	St. Rose Dominican Hospital – Siena	
14			Campus	
15			3001 St. Rose Parkway	
			Henderson, NV 89052	
16			T: 702-616-5000	
17	26.	Nader H Beheshti, M.D.	St. Rose Dominican Hospital – Siena	
18			Campus	
			3001 St. Rose Parkway	
19			Henderson, NV 89052 T: 702-616-5000	
20	27.	Jason Teague, AMR	AMR Las Vegas	
21	27.	Number: 55340	7201 W. Post Rd,	
		Number: 33340	Las Vegas, NV 89113	
22			T: 702-384-3400	
23	28.	Cristopher Hill, AMR	AMR Las Vegas	
24		Number: 108871	7201 W. Post Rd,	
			Las Vegas, NV 89113	
25			T: 702-384-3400	
26	29.	Nathaniel Collins, AMR	AMR Las Vegas	
27		Number: 102717	7201 W. Post Rd,	
			Las Vegas, NV 89113	
28			T: 702-384-3400	
	Ì			

30.	Richard N. Wullf, M.D.	University Medical Center	
		1800 W. Charleston Blvd.	
		Las Vegas, NV 89102	
		T: 702-383-2347	
		And	
		Orthopedic Specialists of Nevada 3233 West Charleston Boulevard, Ste. 101	
		Las Vegas, Nevada 89102 (702) 410-8460	
31.	Casiano R. Flaviano, M.D.	Dignity Health Rehabilitation Hospital	
		2930 Siena Heights Dr.	
		Henderson, NV 89052	
		T: 725-726-2000	
32.	Officer C. Brown,	c/o Las Vegas Metropolitan Police	
	Badge No. 18270	Department	
		400 S. Martin Luther King Blvd.	
		Las Vegas, NV 89101	
		T: 702-828-3111	
33.	Kevin Mounts, Director of Security	M Resort Spa Casino	
		12300 Las Vegas Blvd. S.	
		Henderson, NV 89044	
		T: 702-797-1000	
34.	Robin Orrells	Assistant Director of Security and	
		Surveillance	
		3700 W. Flamingo Rd.	
		Las Vegas, NV 89109	
		T: 702-777-6829	
35.	Alexis Carter, AMR	AMR Las Vegas	
	Number: 112281	7201 W. Post Rd,	
		Las Vegas, NV 89113	
		T: 702-384-3400	

(b) Defendant's witnesses:

1.	Joyce Vickery	c/o DE CASTROVERDE LAW GROUP
		1149 South Maryland Pkwy
		Las Vegas, NV 89104
		T: 702-241-5730

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Cas	e 2:23-	cv-00137-APG-BNW Document 55	Filed 10/31/24 Page 12 of 26				
1	2. Demetric Danard Solomon		c/o Michael Shirts				
2			Lewis Brisbois Bisgaard & Smith, LLP				
3			6385 S. Rainbow Boulevard, Suite 600 Las Vegas, NV 89118				
			T: 702-893-3383				
4	3.	Officer Stephen Kircher,	c/o Las Vegas Metropolitan Police				
5		Badge No. 3390	Department				
6			400 S. Martin Luther King Blvd. Las Vegas, NV 89101				
7			T: 702-828-3111				
8	4.	Patrick D. Stadler	Momentum Engineering Corp.				
			3960 Howard Hughes Pkwy, Suite 500				
9			Las Vegas, NV 89169				
10	T: 310-618-8017						
11	Insert text here						
12	IX.						
13	The at	torneys or parties have met and join	tly offer these three trial dates:				
14	April 7th, 2025 May 5th, 2025 June 2nd, 2025						
15 16	It is ex	pressly understood by the undersigned	I that the court will set the trial of this				
17	matter	on one of the agreed-upon dates if pos	ssible; if not, the trial will be set at the				
18	conver	nience of the court's calendar.					
19							
20		X.					
21							
22	It is es	timated that the trial will take a total of	5 days.				
23							
24	APPRO	OVED AS TO FORM AND CONTENT:					
25	DATE	O this <u>30th</u> day of October, 2024.	DATED this 30th day of October, 2024				
26		•	· ·				
27	DE CA	STROVERDE LAW GROUP	LEWIS BRISBOIS BISGAARD & SMITH, LLP				
28							

148124002.1 Page **12** of **13**

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Nevada Bar No. 12641
Attorney for Defendant
6385 S. Rainbow Blvd. Ste. 600
Las Vegas, NV 89118
Attorneys for Defendant

XI.
ACTION BY THE COURT

This case is placed on the April 7, 2025 Trial Stack.

Jury trial on April 7, 2025 at 9:00 a.m. in Courtroom 6C.

Calendar call on April 1, 2025 at 9:00 a.m. in Courtroom 6C.

12 DATED: October 31, 2024.

UNITED STATES DISTRICT JUDGE

"ATTACHMENT A"

Alex J. De Castroverde, Esq. 1 Nevada Bar No. 6950 Orlando De Castroverde, Esq. 2 Nevada Bar No. 7320 3 DE CASTROVERDE LAW GROUP 1149 S. Maryland Parkway 4 Las Vegas, Nevada 89104 Phone: (702) 241-5768 5 Facsimile: (702) 383-8741 6 Email: brandonn@dlgteam.com Attorney for Plaintiff 7

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOYCE VICKERY, an individual,

Plaintiff,

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DEMETRIC DANARD SOLMON, an individual; DOES 1-20 and ROE BUSINESS ENTITIES 1-20, inclusive,

Defendant.

CASE NO.: 2:23-cv-00137-CDS-BNW

"ATTACHMENT A" TO:

JOINT PRETRIAL ORDER

l —							
EX	. #	Start Bates	End Bates	Document Title	Objection/Stipulation		
	1.	PLTF000001	PLTF000009	State of Nevada Traffic Crash Report and Voluntary Statement	No objection.		
	2.	N/A	N/A	Las Vegas Metro Police Department Bodycam Footage	No objection.		
	3.	PLTF000010	PLTF000019	University Medical Center, billing statement for date of service 10/21/2021 through 10/31/2021	No objection.		

1	4.	PLTF000020	PLTF000021	Sound Physicians, billing statement	No objection.
2				with Certificate of Custodian of	
3				Records	
4				for dates of	
5				service 10/23/2021 through	
6				10/31/2021	
7	5.	PLTF000022	PLTF000025	Desert Radiology,	No objection.
8				medical records for	,
9				date of service 02/28/2022	
10	6.	PLTF000026	PLTF000026	Monos Health,	No objection.
11	0.	1 11 000020	1 11 000020	billing statement for	No objection.
12				date of service 02/08/2022	
13		DI TE00007	DI TE00007	Link and to Marking	Nie akiastiau
14	7.	PLTF000027	PLTF000037	University Medical Center, updated	No objection.
15				billing statement with Notarized	
16				Custodian of	
17				Records for dates of service	
18				10/21/2021 through 10/31/2021	
19					
20	8.	PLTF000038	PLTF000045	Desert Radiology Solutions, updated	No objection.
21				billing statement with Notarized	
22				Custodian of	
23				Records for dates of service	
24				10/21/2021 through	
25				10/31/2021	
26	9.	PLTF000046	PLTF000084	Desert Radiology Solutions, updated	No objection.
27				medical records	
28				with Notarized	
- 1	1				

1 2 3				Custodian of Records for dates of service 10/21/2021 through 02/28/2022	
4	10.	PLTF000085	PLTF000085	Desert Radiology	No objection.
5				Solutions, Certificate of	
6				Imaging Records for dates of	
7				service 10/21/2021	
8				- 10/31/2021	
9	11.	PLTF000086	PLTF000144	Monos Health, updated medical	No objection.
10				records and billing	
11				statement with Notarized	
13				Custodian of Records	
14				for date of service	
15				02/08/2022	
16	12.	PLTF000145	PLTF000182	Orthopaedic Specialists of	No objection.
17				Nevada, updated	
18				medical records and billing	
19				statement with Custodian of	
20				Records for dates of service	
21				10/22/2021 through	
22				03/04/2022	
23	13.	PLTF000183	PLTF000224	Dignity Health Physical Therapy,	No objection.
24				billing statement	
25				with Notarized Custodian of	
26				Records for dates of service	
27				10/31/2021 through	
28				01/20/2022	
	1				

1 2 3	14.	PLTF000225	PLTF000412	Monos Health, updated medical records for dates of service 02/08/2022	No objection.
4	15.	PLTF000413	PLTF000418	UNLV Health,	No objection.
5				billing statement with Custodian of	
6				Records for dates	
7				of service 10/21/2021	
8				through 10/23/2021	
9	16.	PLTF000419	PLTF000421	UNLV Health,	No objection.
10				Custodian of No Records found	
11	17.	PLTF000422	PLTF000427	Laboratory	No objection.
12				Medicine Consultants	,
13				Pathology	
14				Services, Custodian of No	
15				Records found	
16	18.	PLTF000428	PLTF000430	Laboratory	No objection.
17				Medicine Consultants	
18				Pathology Services, billing	
19				statement for	
20				dates of service 10/21/2021 through	
21				10/29/2021	
22	19.	PLTF000431	PLTF000434	Clark County Fire	No objection.
23				Department, medical records	
24				with Notarized Custodian	
25				of Records for date	
26				of service 10/21/2021	
27	20.	PLTF000435	PLTF000435	University Medical	No objection.
28		1 211 000 100	. 11 000-00	Center,	Tto objection.

1 2 3				Certification of Radiology Imaging	
4	21.	PLTF000436	PLTF001406	University Medical	No objection.
5				Center, medical records with	,
6				Certification of	
7				Medical Records for dates	
8				of service 10/21/2021 through	
9				10/31/2021	
10	22.	PLTF001407	PLTF004799	Dignity Health	No objection.
11				Physical Therapy, medical records for	
12				dates of service 10/31/2021 through	
13				01/20/2022	
14	23.	PLTF004800	PLTF004801	American Medical	No objection.
15				Response, billing statement for dates	
16				of service	
17				10/21/2021 through 01/24/2022	
18					
19	24.	PLTF004802	PLTF004825	American Medical Response, medical	No objection.
20				records with Notarized	
21				Custodian of	
22 23				Records for dates of service	
24				10/21/2021 through 01/24/2022	
25	25.	PLTF004826	PLTF004826	ATI Physical	No objection.
26		1 11 004020	1 11 004020	Therapy, billing	No objection.
27				statement for dates of service	
28				03/14/2022 through 03/17/2022	
		•		-	

			T	T	
1 2 3 4 5 6	26.	PLTF004827	PLTF004850	ATI Physical Therapy, medical records with Certification of Medical Records for dates of service 03/14/2022 through 04/08/2022	No objection.
7 8 9 10 11 12 13 14	27.	PLTF004851	PLTF004851	The Rio All-Suite-Hotel & Casino surveillance video of the subject incident **Disclosed by Dropbox – Plaintiff's 2 nd Supplemental Disclosure per FRCP 26 (a)(1) on 9/5/2023	No objection.
15 16 17 18 19 20	28.	PLTF004852	PLTF004856	St. Rose Dominican Hospital – Siena Campus, billing statement for dates of service 12/10/2021 through 01/25/2022	No objection.
21 22 23 24 25 26 27 28	29.	PLTF004857	PLTF005205	St. Rose Dominican Hospital – Siena Campus, medical records with Certification of Custodian of Records for dates of service 12/10/2021 through 01/25/2022	No objection.

- 1						
1 2	30.	PLTF005206	PLTF005206	One (1) color photo of Plaintiff's right arm scar	No objection.	
3	31.	PLTF005207	PLTF005207	One (1) color photo	No objection.	
4				of Plaintiff's right leg scar		
5						
6	32.	PLTF005207	PLTF005578	Non-Party, Progressive Direct	No objection.	
7				Insurance Company's		
8				Response to		
9				Subpoena to Produce		
10				Documents, Information and		
11				Objection with		
12				Affidavit of Custodian of		
13				Records		
14	33.	PLTF005579	PLTF005579	St. Rose	No objection.	
15				Dominican Hospital – Siena Campus,		
16				Notarized		
17				Custodian of Records for		
18				radiology imaging		

--

"ATTACHMENT B"

LEWIS BRISBOIS BISGAARD &

SMITH, LLP
Darrell D. Dennis, Esq.
Nevada Bar No. 6618
Michael R. Smith, Esq.
Nevada Bar No. 12641
6385 S. Rainbow Blvd. Ste. 600

Las Vegas, NV 89118 Attorneys for Defendant

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

JOYCE VICKERY, an individual,

Plaintiff,

٧.

DEMETRIC DANARD SOLMON, an individual; DOES 1-20 and ROE BUSINESS ENTITIES 1-20, inclusive,

Defendant.

CASE NO.: 2:23-cv-00137-CDS-BNW

"ATTACHMENT B" TO: JOINT PRETRIAL ORDER

EX. #	Start Bates	End Bates	Document Title	Objection/Stipulation
1.	DEF000001	DEF000004	Plaintiff's Complaint, filed with the Eighth Judicial District Court for the State of Nevada on November 18, 2022	No objection.
2.	DEF000005	DEF000009	Defendants' Answer to Plaintiff's Complaint, filed with the Eighth Judicial District Court for the State of Nevada on December 29, 2022	No objection.
3.	DEF000010	DEF000026	Defendant's Petition for Removal filed in the United States	No objection.

Page **1** of **3**

1				District Court for the District of	
2				Nevada	
3	4.	DEF000027	DEF000035	State of Nevada Traffic Accident	No objection.
4				Report for Event Number	
5		DEFORMA	DEF00007	LLV211000087236	Oliveria The
6	5.	DEF000036	DEF000037	Redacted GEICO Casualty Company	Objection. The proposed documents
7				Policy No. 6074- 74-69-57, in force	are irrelevant, lack foundation, and are
8				between July 31, 2021 to January	otherwise inadmissible FRCP 402.
9				31, 2022	11(01 402.
10	6.	DEF000038	DEF000063	GEICO Casualty Company Florida	Objection. The proposed documents
11				Family Automobile	are irrelevant, lack
12				Insurance Policy	foundation, and are otherwise inadmissible
13					FRCP 402.
14	7.	DEF000064	DEF000072	Fox Rent A Car Rental Agreement	Objection. The proposed documents
15				and Accident Report	are hearsay, per FRCP 801 and 802.
16	8.	DEF000073	DEF000076	Fox Rent A Car	Objection. The
17				vehicle photographs	proposed documents are hearsay, per
18		DEF MEC	DEEMEC	Assidant	FRCP 801 and 802.
19	9.	0001	DEF MEC 0015	Accident Reconstruction	Objection. The proposed documents
20				Report, Patrick D. Stadler, BSME,	are hearsay, per FRCP 801 and 802.
21	10.	DEF MEC	DEF MEC	ACTAR Curriculum Vitae	Objection. The
22	10.	0016	0020	and Testimony	proposed documents
23				History for Patrick Stadler, BSME,	are hearsay, per FRCP 801 and 802.
24	11.	DEF MEC	DEF MEC	ACTAR Fee Schedule for	Objection. The
25	11.	0021	0022	Momentum	proposed documents
26				Engineering Corp.	are hearsay, per FRCP 801 and 802.
27					
28			•	•	•

Cas	Case 2:23-cv-00137-APG-BNW Document 55 Filed 10/31/24 Page 25 of 26					
				-T		
1	12.	DEF MEC 0023	DEF MEC 0026	Accident Reconstruction	Objection. The proposed documents	
2				Report Supplement,	are hearsay, per FRCP 801 and 802.	
3				Patrick D. Stadler,	TROI OUT AND OUZ.	
4				BSME, ACTAR		
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			P	age 3 of 3		

Page 3 of 3

Sohamy L. Tejada

From: Smith, Michael R. (LV) < Michael.R. Smith@lewisbrisbois.com>

Sent: Wednesday, October 30, 2024 4:21 PM

To: Sohamy L. Tejada; Dennis, Darrell; Halas, Cynthia; Millero, Alexia Cc: Orlando De Castroverde; Piero Caceres; Brandonn Grossman

Subject: RE: Vickery v Solomon Joint Pretrial Order ** Urgent- Deadline Today

CAUTION: This email originated from outside of the organization. Be cautious when opening attachments or clicking links.

Good afternoon.

This is fine to submit to the Court.

-Michael



Michael R. Smith **Partner** Michael.R.Smith@lewisbrisbois.com

T: 702.830.9017 F: 702.366.9563

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From: Sohamy L. Tejada <Sohamy@dlgteam.com> Sent: Wednesday, October 30, 2024 4:18 PM

To: Smith, Michael R. (LV) <Michael.R.Smith@lewisbrisbois.com>; Dennis, Darrell <Darrell.Dennis@lewisbrisbois.com>;

Halas, Cynthia <Cynthia.Halas@lewisbrisbois.com>; Millero, Alexia <Alexia.Millero@lewisbrisbois.com>

Cc: Orlando De Castroverde <orlando@dlgteam.com>; Piero Caceres <piero@dlgteam.com>; Brandonn Grossman

<Brandonn@dlgteam.com>

Subject: RE: Vickery v Solomon Joint Pretrial Order ** Urgent- Deadline Today

EXTERNAL

Good afternoon,